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15 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
16 **SAN JOSE DIVISION**

17 JOSEPH TAYLOR, EDWARD MLAKAR,
18 MICK CLEARY, and EUGENE ALVIS,
individually and on behalf of all others
similarly situated,

19 Plaintiffs,

20 v.

21 GOOGLE LLC,

22 Defendant.
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Case No. 5:20-cv-07956-VKD

**L.R. 6-2 STIPULATED REQUEST TO
EXTEND OMNIBUS MOTION TO
SEAL DEADLINES AND [PROPOSED]
ORDER**

Judge: Hon. Virginia K. DeMarchi

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Pursuant to this Court’s Case Management Order (ECF No. 99) and Civil L.R. 6-2, Plaintiffs Joseph Taylor, Edward Mlakar, Mick Cleary, Eugene Alvis, and Jennifer Nelson (“Plaintiffs”) and Defendant Google LLC (“Google”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, the current deadline for Google’s Omnibus Motion to Seal materials filed in connection with Plaintiffs’ motion for class certification (including any opposition, reply, or other filings related to that motion) and any expert challenge motions filed on March 11, 2025 by either party (including any oppositions, replies, or other filings related to those motions) (collectively, the “Materials”) is August 6, 2025 (ECF No. 205);

WHEREAS, when this date was set, Class Certification and Expert Challenges Replies were due on July 22, 2025;

WHEREAS, due to changes in schedule, Class Certification and Expert Challenge Replies were filed a week later on July 29, 2025;

WHEREAS, in order to allow sufficient time for briefing, the Parties have agreed to extend the deadline for Google’s Omnibus Motion to Seal from August 6, 2025 to August 13, 2025;

WHEREAS, the Parties have agreed to extend the deadline for Plaintiffs’ opposition to Google’s Omnibus Motion to Seal, if any, from August 20, 2025 to August 27, 2025;

WHEREAS, the Parties have agreed to extend a reply in support of Google’s Omnibus Motion to Seal, if any, from September 10, 2025 to September 17, 2025

WHEREAS, for the reasons set forth in the Declaration of Whitty Somvichian in Support of the L.R. 6.2 Stipulated Request for Order Extending Omnibus Motion to Seal Deadlines, the Parties jointly agree that good cause exists to grant the extension of time, including because: (1) Google’s Omnibus Motion to Seal should cover the at issue Materials and account for the changed reply briefing deadline; (2) the Parties are actively litigating both this matter and the concurrent *Csupo v. Google LLC* matter in Superior Court in Santa Clara County, which raises materially the same claims at issue in this litigation, and which was litigated at trial between June 1, 2025 and July 1, 2025 and; (3) the Parties have negotiated extensively regarding the issues driving this request and have made every effort to resolve any underlying disputes without Court intervention;

(4) the requested extensions will not impact the trial date set in this case; and (5) the requested extensions are in the interests of both Parties and the just and efficient progress of this matter, and are critical to the Parties' ability to present the most helpful briefing and presentations to this Court.

NOW, THEREFORE, the Parties, by and through their respective counsel, stipulate and agree that the following revisions should be made to the case schedule:

Event	Current Deadline	Stipulated Deadline
Omnibus Motion to Seal	August 6, 2025	August 13, 2025
Opposition to Omnibus Motion to Seal, if any	August 20, 2025	August 27, 2025
Any reply in support of Omnibus Motion to Seal	September 10, 2024	September 17, 2025

IT IS SO STIPULATED.

Dated: August 1, 2025

Respectfully submitted,

COOLEY LLP

By: /s/ Whitty Somvichian
Whitty Somvichian

Attorney for Defendant
GOOGLE LLC

Dated: August 1, 2025

KOREIN TILLERY LLC

By: /s/ Chad E. Bell
Chad E. Bell

Attorney for Plaintiffs

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ATTESTATION OF CONCURRENCE IN FILING

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, the undersigned hereby attests that concurrence in the filing of this document has been obtained.

Dated: August 1, 2025

COOLEY LLP

/s/ Whitty Somvichian

Whitty Somvichian

Attorneys for Defendant
GOOGLE LLC

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

The Honorable Virginia K. DeMarchi
United States Magistrate Judge